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*Co-Lead Counsel for Plaintiffs*

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

This Document Relates to:

## STIPULATION AND [PROPOSED] ORDER TO RESET PRETRIAL DEADLINES

## ALL WAVE 1 BELLWETHER CASES

Judge: Hon. Charles R. Breyer  
Courtroom: Courtroom 6-17<sup>th</sup> Floor

WHEREAS, on May 1, 2025, the Court issued Pretrial Order No. 26: Bellwether Trial Wave 1 Case Assignments and Discovery Schedule;

WHEREAS, Pretrial Order No. 26, which required the parties to exchange expert reports by August 8, 2025 and rebuttal expert reports by September 8, 2025, was modified by Stipulation and Court Order to require the parties to submit expert reports by August 22, 2025, and rebuttal expert

1 reports by September 22, 2025 [ECF 3533];  
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3       WHEREAS, Pretrial Order No. 26 was further modified by Stipulation and Court Order to  
4 require the parties to submit expert reports by August 29 and rebuttal expert reports by September 29  
5 [ECF 3705];

6       WHEREAS, at the August 22, 2025 Case Management Conference, the Court informed the  
7 parties that the first bellwether trial will begin on January 6, 2026, rather than December 8, 2025 [ECF  
8 3725];

9       WHEREAS, Pretrial Order No. 26 was further modified by Stipulation and Court Order to  
10 require the parties to submit expert reports by September 12, 2025 and rebuttal expert reports by  
11 October 13, 2025 [ECF 3757];

12      WHEREAS, on September 10, 2025, the parties submitted a Stipulation and Order to the Court  
13 extending expert reports and rebuttal reports [Dkt. 3893] for B.L., A.R.2, Dean, LCHB128, and WHB  
14 823;

15      WHEREAS, the parties also jointly request a pretrial conference date, upon which the dates  
16 required under the Court's Standing Order Regarding Guidelines for Civil Jury Trials can be  
17 predicated.

18      WHEREAS, the parties anticipate that the pretrial conference will pertain to the first-  
19 scheduled trial (the Jaylynn Dean case) and will address this in their forthcoming joint statement in  
20 advance of the October 3, 2025 Status Conference.

21      WHEREAS, given the additional time made available by the new trial date, the parties agree  
22 that pretrial deadlines for the five Wave 1 cases that have substantially completed fact discovery  
23 should be modified as follows:

24           For B.L., A.R.2, Dean, LCHB128, and WHB 823:

- |  |                    |
|--|--------------------|
| 25           • Expert Reports:   | September 26, 2025 |
| 26           • Rebuttal Reports:   | October 24, 2025   |
| 27           • Dispositive Motions and Daubert Motions<br>28           for Experts Who Serve 9/26 Reports: | November 10, 2025  |
| • Daubert Motions for Experts<br>Who Serve Only 10/24 Reports:   | November 14, 2025  |

- Dispositive/Daubert Oppositions: December 10, 2025
  - Dispositive/Daubert Replies: December 23, 2025

trial Conference for Dean Trial: To be set by the Court

Pretrial Conference for Dean Trial: To be set by the Court

For WHB 318:

- Fact Disc. Substantial Completion: November 3, 2025
  - Expert Reports: November 17, 2025
  - Rebuttal Reports: December 15, 2025
  - Close of Discovery: December 30, 2025
  - Dispositive/Daubert Motions: January 5, 2026
  - Dispositive/Daubert Oppositions: January 19, 2026
  - Dispositive/Daubert Replies: February 2, 2026

THEREFORE, the parties respectfully request the Court enter the parties' stipulation and that, the following deadlines set by Pretrial Order No. 26 and modified by ECF 3533, 3705, and 3858 be extended as follows:

For B.L., A.R.2, Dean, LCHB128, and WHB 823:

- Expert Reports: September 26, 2025
  - Rebuttal Reports: October 24, 2025
  - Dispositive Motions and Daubert Motions for Experts Who Serve 9/26 Reports: November 10, 2025
  - Daubert Motions for Exprts Who Serve Only 10/24 Reports: November 14, 2025
  - Dispositive/Daubert Oppositions: December 10, 2025
  - Dispositive/Daubert Replies: December 23, 2025

Pretrial Conference for Dean Trial: To be set by the Court

For WHB 318:

- Fact Disc. Substantial Completion: November 3, 2025
  - Expert Reports: November 17, 2025
  - Rebuttal Reports: December 15, 2025
  - Close of Discovery: December 30, 2025

- 1        • Dispositive/Daubert Motions:        January 5, 2026
- 2        • Dispositive/Daubert Oppositions:    January 19, 2026
- 3        • Dispositive/Daubert Replies:        February 2, 2026

4           **IT IS SO STIPULATED.**

5            DATED: September 22, 2025

6            Respectfully submitted,

7            By: /s/ Rachel Abrams  
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31          *Co-Lead Counsel for Plaintiffs*

32          Dated: September 22, 2025

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34          /s/ Laura Vartain  
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13                  *Attorneys for Defendants*  
14                  UBER TECHNOLOGIES, INC.,  
15                  RASIER, LLC, and RASIER-CA, LLC

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## **ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

Dated: September 22, 2025

/s/ Andrew R. Kaufman

Andrew R. Kaufman

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2                   **[PROPOSED] ORDER**  
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5                   **IT IS SO ORDERED.**  
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Dated: \_\_\_\_\_

Honorable Charles R. Breyer  
United States District Judge